

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULINEI VICENTE-DE OLIVEIRA (1),
and ENILDA DE OLIVEIRA-
FERNANDES PIRES (2), and HELLEN
FERNANDES-PIRES (3),

Defendant.

3:19-M-08661(1,2,3)

2019 SEP 27 AM 11:11
WESTERN DISTRICT OF TEXAS
SL
DEPUTY

**GOVERNMENT'S MOTION TO DETAIN DEFENDANTS
WITHOUT BOND AND MOTION FOR CONTINUANCE**

COMES NOW the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendants Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendants were arrested for a violation of Title 18, United States Code, Sections 371, *Conspiracy to Defraud the United States Government*.
2. The Defendants are foreign nationals, and, as such, present a high risk of fleeing to avoid prosecution on this charge.
3. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendants at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendants without bail pending the final outcome of this case.

Respectfully submitted,

JOHN F. BASH
UNITED STATES ATTORNEY

By:



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